

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re OPTIONABLE SECURITIES
LITIGATION

Case No. 07 Civ. 03753 (LAK)

**NOTICE OF MOTION AND MOTION OF SCOTT WALDMAN FOR
APPOINTMENT AS LEAD PLAINTIFF AND FOR APPROVAL OF
SELECTION OF LEAD COUNSEL**

WOLF POPPER LLP
Marian P. Rosner (MR - 0410)
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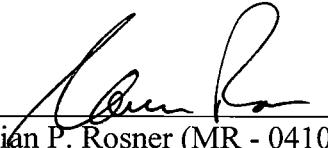
NOTICE OF MOTION

PLEASE TAKE NOTICE that Plaintiff Scott Waldman will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) appointing Scott Waldman as Lead Plaintiff; (ii) approving Lead Plaintiff's selection of the law firm of Wolf Popper LLP to serve as Lead Counsel; and (iii) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Scott Waldman submits herewith a Memorandum of Law and Declaration of Patricia I. Avery, dated July 10, 2007.

Dated: July 10, 2007
New York, New York

Respectfully submitted,

WOLF POPPER LLP

By: 
Marian P. Rosner (MR - 0410)
Patricia I. Avery (PA - 8423)
845 Third Avenue
New York, New York 10022
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Attorneys for Scott Waldman

CERTIFICATE OF SERVICE

I, E. Elizabeth Ferguson, hereby certify that on July 10, 2007, I caused a true and correct copy of the attached document to be served by U.S. Mail, postage prepaid, or Federal Express, on the parties, or their counsel of record, identified on the attached service list:



E. Elizabeth Ferguson

SERVICE LIST

<p>Kaplan Fox & Kilsheimer LLP Jeffrey Philip Campisi Frederick S. Fox Donald R. Hall 805 Third Avenue New York, NY 10022 Attorneys for Plaintiff Gerald Manowitz</p>	<p>Lawrence R. Gelber Lawrence Robert Gelber 34 Plaza Street East, Suite 1107 Brooklyn, NY 11238 Attorneys for the Defendant Kevin Cassidy</p>
<p>Kelley Drye & Warren, LLP (CT) Mark Scott Gregory Thomas Benjamin Kinzler Christine Schessler Poscablo Kevin James Smith Two Stamford Plaza 281 Tresser Boulevard Stamford, CT 06901 Attorneys for Defendant Optionable, Inc.</p>	<p>Kahn, Gauthier Law Group, L.L.C. Lewis Stephen Kahn 650 Poydras St. Suite 2150 New Orleans, LA 70130 Attorneys for Plaintiff Alexander Fleiss</p>
<p>Kahn Gauthier Swick, LLC Kim Elaine Miller 12 East 41st Street 12th Floor New York, NY 10017 Attorneys for Plaintiff Alexander Fleiss</p>	<p>Connell Foley LLP Peter Joseph Pizzi 888 7th Avenue New York City, NY 10106 Attorneys for Defendant Albert Helmig</p>
<p>Sarraf Gentile, LLP Ronen Sarraf 485 Seventh Avenue New York, NY 10018 Attorneys for Plaintiff Jagdish Patel</p>	<p>Lerach, Coughlin, Stoia, Geller, Rudman & Robbins, LLP(LIs) Mario Alba, Jr David Avi Rosenfeld Samuel Howard Rudman 58 South Service Road Suite 200 Melville, NY 11747 Attorneys for Plaintiff Jonathan Glaubach</p>

<p>Abraham Fruchter & Twersky LLP Jack Gerald Fruchter One Penn Plaza Suite 1910 New York, NY 10119</p> <p>Attorneys for Plaintiff Jonathan Glaubach</p>	<p>Cohen, Milstein, Hausfeld & Toll, PLLC Steven Jeffrey Toll Catherine A. Torell 1100 New York Avenue., N.W. Washington, D.C., DC 20005</p> <p>Attorneys for Plaintiff Stanley T. Bock</p>
<p>Brodsky & Smith, L.L.C. Evan J Smith 240 Mineola Blvd. Mineola, NY 11501</p>	